1 2 3 4 5 6	RENE L. VALLADARES Federal Public Defender Nevada State Bar No. 11479 RAQUEL LAZO Assistant Federal Public Defender 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 (702) 388-6577/Phone (702) 388-6261/Fax Raquel_Lazo@fd.org	
7	Attorney for Somxay Soyinthisane	
8	UNITED STATES D	ISTRICT COURT
9	DISTRICT OF NEVADA	
10	UNITED STATES OF AMERICA,	Case No. 2:18-cr-298-RFB-GWF
11	Plaintiff,	UNOPPOSED MOTION TO
12	V.	MODIFY CONDITIONS TO PERMIT TRAVEL
13	SOMXAY SOYINTHISANE,	(Expedited Treatment Requested)
14	Defendant.	(Empedited Treatment Trequestes)
15		
16	Comes now the defendant, Somxay Soyinthisane, by and through his counsel of	
17	record, Raquel Lazo, Assistant Federal Public Defender, and hereby files this Unopposed	
18	Motion to Modify Conditions to Permit Travel. This request is based on the Points and	
19	Authorities attached hereto.	
20	DATED this 5 th day of March, 2019.	
21		RENE L. VALLADARES
22	F	Federal Public Defender
23	By:	s/Raquel Lazo
24	RAQUEL LAZO Assistant Federal Public Defender	
25	A	Attorney for Somxay Soyinthisane
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POINTS AND AUTHORITIES

- 1) On September 21, 2018, this Court released Mr. Soyinthisane on a personal recognizance bond with conditions. *See* PR Bond (#8).
- 2) Mr. Soyinthisane's travel is restricted to Clark County, Nevada. *Id.* Mr. Soyinthisane respectfully requests that his conditions be modified to permit him to travel to Fresno, California. Mr. Soyinthisane, along with his wife and children, will be traveling together to visit family, specifically a cousin who is undergoing chemotherapy treatment.
- 3) Mr. Soyinthisane also plans to attempt to get an identification card through the state of California (as they apparently already have his records on file). He has been having difficulty getting an identification card in the state of Nevada.
- 3) Mr. Soyinthisane is requesting travel permission from March 7, 2019 to March 12, 2019. Mr. Soyinthisane will provide detailed travel plans and itinerary to Pretrial Services Officer McKillip. Officer McKillip will fashion whatever parameters she feels are necessary for the trip.
 - 4) Pretrial Services Officer McKillip has no opposition to this request.
 - 5) The government also has no opposition to this request. Dated this 5th day of March, 2019.

Respectfully submitted,

RENE L. VALLADARES Federal Public Defender

By: /s/Raquel Lazo

RAQUEL LAZO Assistant Federal Public Defender Attorney for Somxay Soyinthisane

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:18-cr-298-RFB-GWF

ORDER

Plaintiff,

v.

SOMXAY SOYINTHISANE,

Defendant.

IT IS HEREBY ORDERED that Defendant Somxay Soyinthisane, is permitted to travel to Fresno, California from March 7 – March 12, 2019, in accord with the proposals set forth in his Unopposed Motion.

DATED this <u>5th</u> day of March, 2019.

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on March 5, 2019, he served an electronic copy of the above and foregoing **Unopposed Motion to Modify Conditions to Permit Travel** (**Expedited Treatment Requested**) by electronic service (ECF) to the person named below:

NICHOLAS A. TRUTANICH United States Attorney JARED GRIMMER Assistant United States Attorney 501 Las Vegas Blvd. South Suite 1100 Las Vegas, NV 89101

/s/ Brandon Thomas

Employee of the Federal Public Defender